

1 MELANIE A. HILL  
2 Nevada Bar No. 8796  
3 **MELANIE HILL LAW PLLC**  
4 1925 Village Center Circle, Suite 150  
5 Las Vegas, Nevada 89134  
6 Tel: (702) 362-8500  
7 Fax: (702) 362-8505  
8 Melanie@MelanieHillLaw.com  
9 *Attorneys for Plaintiffs Jeremy John Halgat*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 JEREMY JOHN HALGAT, an individual,  
13 Plaintiffs,  
14 vs.  
15 UNITED STATES OF AMERICA, DAVID N.  
16 KARPEL, individually, DOES 1 through 100;  
17 and ROES 1 through 100; inclusive,  
18 Defendants.

19 CASE NO.: 2:22-cv-00592-RFB-EJY

20 **STIPULATION TO EXTEND DEADLINE  
21 TO RESPOND TO LVMPD'S MOTION TO  
22 DISMISS AND JOINDER [ECF NOS. 37  
23 AND 38]  
24 (FIRST REQUEST)**

25 NOW COMES the Plaintiff, JEREMY HALGAT ("Plaintiff"), by and through his  
26 attorneys, Melanie A. Hill and Melanie Hill Law PLLC, and Defendant, LAS VEGAS  
27 METROPOLITAN POLICE DEPARTMENT ("LVMPD"), by and through its attorney Robert  
28 Freeman, who hereby stipulate that the deadline for Plaintiff to respond to Defendant LVMPD  
Motions to Dismiss and Joinder [ECF Nos. 37 and 38] be extended pursuant to Local Rule IA 6-1.

29 This is the first request for an extension of the deadlines. In support of this Stipulation and  
30 Request, the parties state as follows:

31 1. Defendant LVMPD filed their Motions to Dismiss on October 21, 2022 [ECF Nos.  
32 37 and 38].

1           2. Plaintiff's deadline to respond to the Motions to Dismiss is November 4, 2022.

2           3. Counsel for Halgat and the United States have conferred to attempt to resolve  
3           counsel for Plaintiffs' request to be added to the Protective Order in place in the underlying criminal  
4           case so that Plaintiff may share the criminal discovery with undersigned counsel. The discovery is  
5           necessary to further plead the complaint in this case in response to arguments made in the currently  
6           pending motions.

7           4. Counsel for Plaintiff has also conferred with the local U.S. Attorneys' office  
8           regarding the same. Counsel have determined that a motion will be necessary to allow counsel for  
9           Plaintiff to be added to the Protective Order in the underlying criminal case so that discovery may be  
10           reviewed by counsel for Plaintiff and used to further plead the complaint in this case. It is also  
11           undersigned counsel's understanding that the United States has no objection to Plaintiff's counsel  
12           being added to the protective order upon further motion and order of this court.

13           5. To allow this motion to be filed and allow counsel to review the underlying criminal  
14           discovery for purposes of prosecuting this civil case and further respond to the pending Motions to  
15           Dismiss, the parties have stipulated to extend Plaintiff's response deadline to December 6, 2022. The  
16           parties have further stipulated to allow Defendants USA and Karpel until January 6, 2023 to file their  
17           responses to Plaintiff's filing.

18           6. This Request for an extension of time is not sought for any improper purpose or  
19           other purpose of delay. Rather, it is sought by the parties solely to allow sufficient time to allow  
20           Plaintiff's counsel to be added to the protective Order in the underlying criminal case, review the  
21           criminal discovery, and respond to the LVMPD's Motion to Dismiss and Joinder.

22  
23  
24  
25  
26        ///

27        ///

28        ///

1 WHEREFORE, the parties respectfully request that the Court extend the deadlines as stipulated  
2 to herein.

3 DATED this 4<sup>th</sup> day of November, 2022.

4 DATED this 4<sup>th</sup> day of November, 2022.

5 LEWIS BRISBOIS BISGAARD & SMITH LLP

6 MELANIE HILL LAW PLLC

7 /s/ Robert Freeman

8 ROBERT FREEMAN

9 Nevada Bar No. 3062

10 E. MATTHEW FREEMAN

11 Nevada Bar No 14198

12 6385 S. Rainbow Blvd., Suite 600

13 Las Vegas, Nevada 89118

14 *Attorneys for Defendant Las Vegas*

15 *Metropolitan Police Department*

16 /s/ Melanie A. Hill

17 MELANIE A. HILL

18 Nevada Bar No. 8796

19 1925 Village Center Circle, Suite 150

20 Las Vegas, NV 89134

21 Telephone: (702) 362-8500

22 Fax: (702) 362-8505

23 Melanie@MelanieHillLaw.com

24 *Attorneys for Plaintiff Jeremy John Halgat*

25 **ORDER**

26 **IT IS SO ORDERED.**

27 DATE

28   
RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

DATED this 7th day of November, 2022.